

**The Dakota Bankruptcy Firm**  
**1630 1st Avenue N**  
**Suite B PMB 24**  
**Fargo, North Dakota 58102-4246**

Invoice submitted to:  
**La Cantina Restaurants (Combined Case Time)**

**Invoice # 10914**

Invoice Date: 01/16/24

Description Invoice Batch La Cantina Cases - Final Invoices

Date	By	Service Summary	Hours/Qty	Rate	Amount
In Reference To: <b>Business Operations</b>					
08/08/23	Mac VerStandig	Research whether cessation of services to debtor-in-possession can be construed as a stay violation, and availability of injunctive relief	0.40	400.00	\$160.00
08/08/23	Mac VerStandig	Review contract with Coca Cola; Review e-mail from Coca Cola; Draft and send detailed response indicating need to continue providing service to debtors	0.30	400.00	\$120.00
08/08/23	Mac VerStandig	Call with client principal re Coca Cola ceasing services	0.10	400.00	\$40.00
08/08/23	Mac VerStandig	Call with T. Kapusta re issues with Coca Cola	0.10	400.00	\$40.00
08/13/23	Mac VerStandig	Draft motion for entities to enter into lease agreements with insiders and research same as part of drafting process	1.70	400.00	\$680.00
				Hours	2.60
				Labor:	\$1,040.00
				Invoice Amount:	\$1,040.00

Date	By	Service Summary	Hours/Qty	Rate	Amount
In Reference To: <b>Case Administration</b>					
07/30/23	Mac VerStandig	Draft motion to pay pre-petition wages and review case law and rules governing same; E-mail to client for review and comment	0.90	400.00	\$360.00
07/30/23	Mac VerStandig	Draft cash collateral motion, reviewing schedules to assess security positions and reviewing budgets prepared by client to show cash flow projections; Review and revise motion; Reformat budgets and update certain figures therein per conversations with client representative had during drafting process; File motion	1.20	400.00	\$480.00
07/30/23	Mac VerStandig	Draft payroll motion, including research of topical case law and review of client payroll records	0.70	400.00	\$280.00
07/30/23	Mac VerStandig	Draft and file motion to retain existing bank accounts	0.40	400.00	\$160.00

Date	By	Service Summary	Hours/Qty	Rate	Amount
07/30/23	Mac VerStandig	Draft critical vendor motion, reviewing pertinent caselaw and interfacing with client representative re scope of critical vendor services, likelihood provision of supplies would continue without payment, and potential claims owed to hard liquor distributors	1.10	400.00	\$440.00
07/30/23	Mac VerStandig	Review and revise motion to alter chief executive compensation structure (with drafting having commenced pre-petition)	0.80	400.00	\$320.00
07/30/23	Mac VerStandig	Draft motion to expedite and review Local Rules to ensure compliance with same	0.40	400.00	\$160.00
07/30/23	Mac VerStandig	Calls with M. Petri re first day motions (10 minutes, 24 minutes, and 10 minutes - first call is separately billed as being subsumed within motion drafting process)	0.60	400.00	\$240.00
07/31/23	Mac VerStandig	Call with client re time for first day motions and e-mail addresses for parties in interest, as well as concerning e-mail to be sent to employees	0.30	400.00	\$120.00
07/31/23	Mac VerStandig	Draft application to employ, supporting declaration, and notice of same	0.40	400.00	\$160.00
07/31/23	Mac VerStandig	Review court's order on hearing for first day motion and status conference; Coordinate service of same and prepare certificate of service for filing	0.50	400.00	\$200.00
07/31/23	Mac VerStandig	Draft e-mail for clients' principal to send employees regarding filing of bankruptcy cases	0.30	400.00	\$120.00
07/31/23	Mac VerStandig	E-mail to client principal attaching various docket entries from day and summarizing salient portions of same	0.30	400.00	\$120.00
08/02/23	Mac VerStandig	Attend first day hearings and argue various motions	2.40	400.00	\$960.00
08/02/23	Mac VerStandig	Prepare for first day hearings, including review of docket activity, preparation of notes on each motion, and outline of testimony to be elicited from clients rep	2.00	400.00	\$800.00
08/02/23	Mac VerStandig	Meet with client rep and prepare him for testimony	0.40	400.00	\$160.00
08/07/23	Mac VerStandig	Call with T. Kapusta re case trajectory, key points of focus in early stages of cases, nature of merchant cash advance loans, potential legal arguments to be introduced during case, and debtors' overall intentions for reorganization	0.40	400.00	\$160.00
08/13/23	Mac VerStandig	Call with M. Petri to verify 2022 tax returns remain unfiled and there are no financial statements for two of three entities; Address potential adequate protection arrangement with Choice; Discuss intent of M. Petri to acquire food truck and permit Bourbon Street to use same	0.20	400.00	\$80.00
08/13/23	Mac VerStandig	Draft Section 1187 / Section 1116 statement for all three debtors; Review and redact tax returns to mask SSN of principal	0.40	400.00	\$160.00
08/15/23	Mac VerStandig	Attend final hearing on various day motions and second interim hearing on cash collateral; Argue same	0.40	400.00	\$160.00
08/21/23	Mac VerStandig	E-mail to UST and Subchapter V trustee re coordinating IDI	0.10	400.00	\$40.00

Date	By	Service Summary	Hours/Qty	Rate	Amount
08/22/23	Mac VerStandig	Detailed e-mail to client representative updating on case status, addressing cash collateral negotiations, addressing potential adversary proceedings against merchant cash advance lenders, discussing need to monitor revenue, addressing Cintas issues, addressing upcoming hearing, addressing potential lease motion, and laying out next steps in jointly administered cases	0.30	400.00	\$120.00
08/28/23	Mac VerStandig	Attend final cash collateral hearing and argue same	0.50	400.00	\$200.00
08/28/23	Mac VerStandig	Call with client re cash collateral agreement and ability to make payments	0.10	400.00	\$40.00
08/28/23	Mac VerStandig	Revise proposed cash collateral order and submit same to court	0.20	400.00	\$80.00
09/02/23	Mac VerStandig	Detailed e-mail to client re upcoming 341 meeting and IDI, need to review financials, status of adversary litigation, status report, potential for other MCA suits and need to assess claims against MCAs that have been paid in full, and other open items	0.30	400.00	\$120.00
09/06/23	Mac VerStandig	Attend meeting of creditors (telephonically)	1.00	400.00	\$400.00
09/06/23	Mac VerStandig	Call with M. Petri to prepare for meeting of creditors	0.50	400.00	\$200.00
09/06/23	Mac VerStandig	Call with UST's office and client re reporting requirements	0.20	400.00	\$80.00
09/06/23	Mac VerStandig	Call with client's principal following 341 meetings to review forward-looking obligations	0.20	400.00	\$80.00
09/06/23	Mac VerStandig	Call with J. Schroder (counsel for Alerus) re debtor guarantees, plan treatment, balloon obligations, and default notice	0.30	400.00	\$120.00
09/12/23	Mac VerStandig	Attend status conference (telephonic)	0.30	400.00	\$120.00
09/23/23	Mac VerStandig	Call with M. Petri re status of three cases, documents to be gathered for tracing purposes and compliance purposes, status of food truck acquisition, impact of weather on business, MCA entities, collection efforts from third party debt collector with unknown underlying obligee, and status of lease motion	0.40	400.00	\$160.00
09/24/23	Mac VerStandig	Detailed e-mail to M. Petri re (i) adequate protection payments on Bourbon Street; (ii) status of lease motion for all three debtors; (iii) documents needed for all three debtors; (iv) real estate tax issues for Petri Enterprises and Gannett Peak; (v) need for information on MCA payments for all three debtors	0.30	400.00	\$120.00
10/01/23	Mac VerStandig	Draft declaration in support of lease motion and review mortgages and bank statements to ensure accuracy of information	0.40	400.00	\$160.00
10/09/23	Mac VerStandig	Review e-mail from J. Schroeder and respond to same re lease motion	0.20	400.00	\$80.00
10/14/23	Mac VerStandig	Call with M. Petri re sales, seasonal issues, property taxes, food truck operations, structure of plans to be drafted, progress on documents for US Trustee, landlord issues on Bourbon Street, and next steps	1.00	400.00	\$400.00
10/17/23	Mac VerStandig	Attend hearing on motion to enter into leases, place agreement on record, and give status update on cases	0.20	400.00	\$80.00

In Reference To: **Case Administration (Expenses)**

Date	By	Service Summary	Hours/Qty	Rate	Amount
07/31/23	Mac VerStandig	Third party mail vendor fees for service of order setting first day motions and notice of status conference	1.00	26.80	\$26.80

Hours 20.60  
Labor: \$8,240.00  
Invoice Amount: \$8,266.80

Date	By	Service Summary	Hours/Qty	Rate	Amount
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In Reference To: **Plan and Disclosure Statement**

10/27/23	Mac VerStandig	Call with client re plans of reorganization, financial projections to be appended thereto, potential liquidation routes for Bourbon Street, creditor classes, and cash flows	0.50	400.00	\$200.00
12/04/23	Mac VerStandig	Multiple calls with client re closure of remaining two restaurants; Draft and file notice of same for Gannett Peak; Use Gannett Peak draft (which is based on Bourbon Street notice) to draft notice for Petri Enterprises	0.50	400.00	\$200.00

Hours 1.00  
Labor: \$400.00  
Invoice Amount: \$400.00

Total Hours: 24.20  
Total Labor: \$9,680.00  
Total Expenses: \$26.80  
**Total Invoice Amount: \$9,706.80**  
**Total Amount Due: \$9,706.80**

**User Summary**

User	Hrs	Rate	Amount
Mac VerStandig	24.20	@ 400.000	9,680.00

**Trust Account**

The Trust Activity shown here is from the previous Invoice date of to the latest payment applied to this invoice which is 01/16/24

Date	Trust Account	Description	Debit	Credit	Balance
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**Matter : Non-Matter Related****La Cantina - Trust Acct.**

	La Cantina - Trust Acct.	Opening balance	0.00	0.00	0.00
07/24/23	La Cantina - Trust Acct.	Retainer (eCheck)	0.00	5,000.00	5,000.00
07/27/23	La Cantina - Trust Acct.	Retainer (eCheck)	0.00	5,000.00	10,000.00
07/28/23	La Cantina - Trust Acct.	Retainer (eCheck)	0.00	5,000.00	15,000.00
07/29/23	La Cantina - Trust Acct.	Payment of pre-filing invoice	7,500.00	0.00	7,500.00

**Trust account ending balance as of 01/16/24 for La Cantina - Trust Acct.: 7,500.00****Trust account ending balance as of 01/16/24 for Non-Matter Related: 7,500.00****Total for La Cantina Restaurants (Combined Case Time): 7,500.00**